

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: <u>5-05-09</u>
v.	:	CRIMINAL NO. <u>09 - 312</u>
KEVIN DIXON	:	VIOLATION: 18 U.S.C. § 641
	:	(Theft of government property - 1 Count)
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. The United States Postal Service is an agency of the United States whose activities include delivery of mail to every address in all fifty states.
2. In order to accomplish its delivery functions, the Postal Service maintains a fleet of vehicles and utilizes contract trucking services.
3. Fuel requirements for vehicles transporting U.S. mail, including contractors, are typically met through use of the Voyager credit card government-wide commercial fleet card program.
4. The Voyager credit card is issued by U.S. Bank National Association (hereinafter U.S. Bank), an institution whose deposits are insured by the Federal Deposit Insurance Corporation (FDIC).
5. The Voyager credit card is an official government credit card and is imprinted with the words, "United States of America - For Official Government Fleet Use Only."
6. Charges made with the Voyager credit card cause invoices to be

electronically sent from the merchant to Voyager/U.S. Bank. Voyager/U.S. Bank sends all USPS fleet transactions electronically to the USPS eFleet card system. The eFleet card system combines these transactions into one consolidated invoice. The invoice is then transmitted to the USPS Accounts Payable system for processing and payment by the USPS. Voyager/U.S. Bank pays merchants within 2-3 business days after the transaction is posted. The Postal Service has paid all invoices submitted by Voyager in connection with the count identified below.

7. Between July 2007 and June 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

KEVIN DIXON

knowingly stole and converted to his own use a thing of value of the United States, that is, \$35,758.16 in automobile fuel transactions, through the unauthorized use of the USPS Voyager credit card at Philadelphia-area gasoline stations.

All in violation of Title 18, United States Code, Section 641.

/s/ Laurie Magid

LAURIE MAGID
UNITED STATES ATTORNEY